

Concerning FCC ET Docket No 04-37  
Gentlemen;

Concerning Part 15 and comparing CCS to BPL.

Acceptable levels under Part 15 for CCS are not applicable to BPL for the following reasons.

CCS is considered a point source radiator. This primarily due to wavelength of emitted signals.

CCS, a mature technology, has demonstrated that levels are sufficient primarily because there is no skywave propagation.

BPL works with shortend and potentially more easily propagated wavelengths and therefore should have a more stringent interference compliance specification. Experience in the BPL proposed frequencies routinely demonstrate propagation to other continents with power levels and wire segments (antennas) less efficient than that of the proposed BPL permitted configurations.

BPL, because of the frequency selection and under optimum skywave propagation conditions can cause not only local, but International interference.

Respectfully Submitted

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